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11 August 2026

Mr. Rob Bishton
CEO, Civil Aviation Authority
Aviation House, Beehive Ring Road
Crawley, West Sussex, RH6 0YR, England
economicregulation@caa.co.uk

Dear Rob,

CAP3286: Consultation on Heathrow's Future Regulatory Framework

American Express Global Business Travel (Amex GBT) welcomes the opportunity to comment on the Civil Aviation Authority's consultation on Heathrow's future regulatory framework.

As the world's leading software and services company for travel, expense, and meetings & events, supporting 22,000 organisations of every size and sector, we see first-hand the importance of Heathrow to the UK's competitiveness. Heathrow is not simply an airport; it is a strategic business asset that enables trade, investment, innovation and international collaboration. The effectiveness with which it operates has direct consequences for companies that depend on global connectivity to grow their businesses.

The CAA is therefore right to recognise that meaningful reform is now required. The existing regulatory model has failed to create sufficiently strong incentives for efficiency or accountability, and incremental adjustments are unlikely to deliver the changes that businesses and travellers need. A more fundamental redesign of the framework offers the opportunity to improve outcomes across cost, service quality and long-term investment.

For corporate customers, these issues are not theoretical. The cost and reliability of Heathrow directly influence the efficiency of business travel programmes, the ability of organisations to connect people and markets, and ultimately the attractiveness of the UK as a place to invest. A better-incentivised Heathrow should deliver lower operating costs, improved service standards and greater confidence that capital investment is being undertaken efficiently. Those outcomes would benefit employers, travellers and the wider economy alike.

We support the CAA's intention to introduce greater competition into Heathrow's operating model. However, achieving the full benefits of reform will require competition to extend beyond a limited set of activities.

Competition between terminal operators would fundamentally improve incentives by creating clear commercial accountability for both investment decisions and operational performance. Where operators compete for capital and to attract airlines and passengers, they have stronger incentives to innovate, improve customer experience and manage costs effectively. This creates a more disciplined investment environment than one in which a single operator remains insulated from the consequences of inefficient decision-making.

Conversely, restricting competition to new assets or to procurement processes alone risks preserving many of the weaknesses that the CAA has correctly identified. If Heathrow Airport Limited continues to determine the scope and design of projects before competition begins, many of the inefficiencies embedded within the current model will remain.



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We welcome the proposal to strengthen capital governance through the creation of a capital committee. Nevertheless, governance arrangements will only be effective if they are supported by regulatory powers that enable the CAA to challenge inefficient expenditure and act decisively where projects fail to demonstrate value for consumers. Effective oversight requires both transparency and meaningful enforcement.

From Amex GBT's perspective, an efficiently regulated Heathrow is an important contributor to the UK's ability to attract international business, facilitate investment and support economic growth. Affordable expansion, delivered within a framework that encourages competition and disciplined capital investment, would strengthen Heathrow's position as a leading global hub while delivering better value for the businesses and travellers who ultimately fund the airport through its charges.

The CAA has an important opportunity to establish a regulatory framework that better aligns commercial incentives with the interests of consumers and the wider economy. We encourage the Authority to proceed with comprehensive reform and to ensure that competition plays a central role in Heathrow's future.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Andrew Crawley".

Andrew Crawley
President
American Express Global Business Travel